

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

CHALPIN REALTY SC, LLC,)	Civil Action No: 4:22-cv-02651-JD
)	
Plaintiff,)	
)	
vs.)	PLAINTIFF AND DEFENDANT’S
)	JOINT MOTION FOR
)	EXTENSIONS TO RESPOND
JERSAM REALTY, INC.,)	
)	
Defendant.)	
)	

Pursuant to Local Civil Rule 6.01, Plaintiff Chalpin Realty SC, LLC (“Plaintiff”) and Defendant Jersam Realty, Inc., (“Defendant”) hereby jointly and respectfully request that the Court extend the response deadlines in this case with each party having twenty-seven (27) days to respond to the other party’s respective motions. By way of background, both parties previously agreed to consent to a fourteen (14) day extension to the other party’s respective response deadlines.¹ However, since then, both parties have consulted and realized the need for additional time due to current obligations.

As such, the parties respectfully request that the response deadlines in this case be equally extended by twenty-seven (27) days as follows:

- Plaintiff’s Response to Defendant’s Motion to Amend (DE 40), which is currently due on November 7, 2023, be extended until Monday, December 4, 2023. No prior extensions have been requested.

¹ Based on the parties’ prior agreement, Defendant, with the Consent of Plaintiff, previously filed a Consent Motion for Extension (DE 38) for a (14) day extension for the filing of its Response to Plaintiff’s Petition for Attorneys’ Fees and Costs (DE 35) and Plaintiff’s Motion to Amend (DE 36), and the Court granted the extension request by way of a text Order (DE 39), which extended the response deadlines to November 7, 2023 for Defendant’s Response to Plaintiffs’ Petition for Attorneys’ Fees and Costs (DE 35) and November 8, 2023 for Defendant’s Response to Plaintiff’s Motion to Amend (DE 36).

- As discussed in footnote one, Defendant previously requested and obtained a two-week extension to respond to Plaintiff's Petition for Attorneys' Fees and Costs (DE 35) and Plaintiff's Motion to Amend (DE 36), and Defendant now seeks an additional thirteen (13) days (for a total of 27 days), which would extend its current response deadlines of November 7th and 8th to November 20, 2023 to respond to Plaintiff's Petition for Attorneys' Fees and Costs (DE 35) and November 21, 2023 to respond to Plaintiff's Motion to Amend (DE 36).

The requested extensions do not affect other deadlines. Counsel jointly makes this request for extension of time due to counsel's other pressing matters leading up to the due dates.

Pursuant to Local Civil Rule 7.02, counsel has consulted, and both parties consent to the requested extensions. Because this joint motion contains a full explanation of the reasons therefor, no supporting memorandum is being submitted pursuant to Local Civil Rule 7.04.

Respectfully submitted,

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November 1, 2023